

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:)
) Case No. 08-35653 (KRH)
CIRCUIT CITY STORES, INC., et al) Chapter 11
)
Debtors) Jointly Administered
)

**JOINDER OF COKEM INTERNATIONAL, INC. TO MOTIONS OF PIONEER
ELECTRONICS AND SAMSUNG ELECTRONICS AMERICA, INC. FOR ORDER
REQUIRING CONFIRMATION DEPOSIT UNDER FED. R. BANKR. P. 3020(a)**

Cokem International, Inc. (“Cokem”), a creditor and holder of an administrative expense claim in the cases of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby joins in the *Motion of Pioneer Electronics Under Fed. R. Bankr. P. 3020(a) for Order Requiring Confirmation Deposit* [Docket No. 5461] and *Samsung Electronics America, Inc.’s Motion Under Fed. R. Bankr. P. 3020(a) for Order Requiring Confirmation Deposit and Joinder to Motion of Pioneer Electronics for Same* [Docket No. 5614] (collectively, the “Motions”), and respectfully states as follows:

BACKGROUND

1. On November 10, 2008, Circuit City Stores, Inc. and its affiliated debtors (the “Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

2. During the 20 days before the Debtors filed this case, the Debtors received goods worth \$414,129.44 from Cokem.

3. The Debtors did not pay for those goods, nor did they return the goods to Cokem. Accordingly, Cokem timely filed an administrative-expense request in accordance with Section 503(b)(9) of the Bankruptcy Code in the amount of \$414,129.44.

4. The Debtors have filed an Amended Joint Plan of Liquidation [Docket No. 5124] and Disclosure Statement [Docket No. 5030], pursuant to which the Debtors state, among other things, that they may not be able to pay all administrative and priority claims in full.

5. On October 13, 2009, the Debtors filed an objection seeking to temporarily disallow a portion of Cokem's administrative claim on the basis that the creditors were recipients of allegedly avoidable preferential transfers.

REQUEST FOR RELIEF AND JOINDER

Cokem hereby joins in the Motions seeking an order from the Court under Rule 3020(a) of the Federal Rules of Bankruptcy Procedure requiring that the Debtors escrow funds in an amount necessary to pay all claims and expenses entitled to be paid on the effective date, including all section 503(b)(9) administrative expense claims, and incorporates the Motions as though fully set forth herein.

CONCLUSION

Cokem respectfully requests that this Court enter an order requiring the Debtors to deposit the funds necessary to pay all claims required to be paid on the effective date of the Plan.

Dated: November 16, 2009

Respectfully submitted,

/s/ Alan M. Noskow

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Joinder of Cokem International, Inc. to Motions of Pioneer Electronics and Samsung Electronics America, Inc. for Order Requiring Confirmation Deposit Under Fed. R. Bankr. P. 3020(a) was served this 16th day of November, 2009, via e-mail or ECF, as appropriate, and electronic mail on the counsel for the Debtors as follows:

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